

AUSA: Zachary Zurek

Telephone: (313) 226-9100

AO 91 (Rev. 11/11) Criminal Complaint

Task Force Officer: Katherine Roshirt

Telephone: (313) 965-2323

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jolyan Raced Zahrah

Case No. 2:25-mj-30386
Judge: Unassigned,
Filed: 06-13-2025 At 05:04 PM
SEALED MATTER (DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2024 - January 2025 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §48(a)(3)	Distribution of animal crush videos
18 U.S.C. §§ 2252A(a)(2)	Distribution of child pornography
18 U.S.C. § 2252A(a)(5)(B)	Possession of child pornography

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

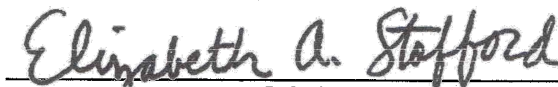
Date: June 13, 2025

City and state: Detroit, MI


Complainant's signature

Katherine Roshirt, TFO, FBI

Printed name and title


Judge's signature

Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Katherine Roshirt, a Task Force Officer with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI). I have been a Task Force Officer with the FBI since February 2023. I am presently assigned to the Detroit, Michigan field office, and work primarily on cases involving domestic violent extremism. I have been a sworn law enforcement officer with the West Bloomfield Police Department since August 2012. I have experience in the investigation, apprehension and prosecution of individuals involved in federal criminal offenses. During these investigations, my duties included participating in search warrants, electronic and physical surveillance, and electronic analysis.

2. I have reviewed numerous examples of animal crush videos as defined in 18 U.S.C. § 48. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 48(a)(3) and 18 U.S.C. § 2252A. I am authorized by law to request an arrest warrant.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Jolyan Raed Zahrah for violations of 18 U.S.C. § 48(a)(3) (distribution of animal crush videos), 18 U.S.C. §§ 2252A(a)(2)

(distribution of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

4. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from investigative sources of information, and my experience, training, and background as a Task Force Officer.

5. This affidavit is submitted for the limited purpose of securing a complaint and an arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that Zahrah has violated the above statutes.

FACTS ESTABLISHING PROBABLE CAUSE

Nihilistic Violent Extremists

6. Nihilistic Violent Extremists (NVEs) are individuals who engage in criminal conduct within the United States and abroad, in furtherance of political, social, or religious goals that derive primarily from a hatred of society at large and a desire to bring about its collapse by sowing indiscriminate chaos, destruction, and social instability. NVEs work individually or as part of a network with these goals

of destroying civilized society through the corruption and exploitation of vulnerable populations, which often include minors.

7. NVEs, both individually and as a network, systematically and methodically target vulnerable populations across the United States and the globe. NVEs frequently use social media communication platforms to connect with individuals and desensitize them to violence by, among other things, breaking down societal norms regarding engaging in violence, normalizing the possession, production, and sharing of child sexual abuse material (CSAM) and gore material, and otherwise corrupting and grooming those individuals towards committing future acts of violence.

8. Those individuals are targeted online, often through synchronized group chats. NVEs frequently conduct coordinated extortions of individuals by blackmailing them so they comply with the demands of the network. These demands vary and include, but are not limited to, self-mutilation, online and in-person sexual acts, harm to animals, sexual exploitation of siblings and others, acts of violence, threats of violence, suicide, and murder.

9. Historically, NVEs systematically targeted vulnerable individuals by grooming, extorting, coercing, and otherwise compelling through force, or the threat of force, the victims to mutilate themselves or do violence, or threaten violence, to others and either film or photograph such activity. The members of the network have

edited compilation photographs or videos of targeted individuals, shared the photographs and videos on social media platforms for several reasons, including to gain notoriety amongst members of the network, and spread fear among those targeted individuals for the purpose of accelerating the downfall of society and otherwise achieving the goals of the NVEs.

10. NVE networks have adopted various monikers to identify themselves. The networks have changed names over time, which has led to the creation of related networks. Although the networks change names and use a variety of different social media platforms, the core members and goals remain consistent and align with the overarching threat of NVE.

764 and related networks

11. “764” and related groups are NVEs who engage in criminal conduct within the United States and engage with other extremists abroad. The 764 network’s accelerationist goals include social unrest and the downfall of the current world order, including the United States Government. Members of 764 work in concert with one another towards a common purpose of destroying civilized society through the corruption and exploitation of vulnerable populations, including minors.

Identification of Jolyan Raeed Zahrah as Discord User Sharing CSAM

12. Discord is an instant messaging and social platform which allows communication among users through voice calls, video calls, text messaging, and media sharing.

13. In order to use Discord services, users need to create an account by selecting a username. Once an account is created, users can create a server and invite their friends to join it with an invite link, or they can join an existing server. Servers are broken down into sub-categories or “channels” where users can connect with each other by either chatting or calling. Users can also communicate through direct messages, which are private chats of up to ten users.

14. On September 22, 2023, the FBI received an online tip regarding email account rdaXXXXspeedy@gmail.com sharing CSAM on Discord. A Discord subpoena return revealed email account rdaXXXXspeedy@gmail.com was tied to an account with the username “dars_ss#0” (the “dars_ss account.”). The dars_ss account connected to a specific IP address five separate times on September 25, 2023. According to a subpoena return from Comcast, the subscriber of the IP address is Adult-1 at XXXXX Ring Neck Drive (located in the Eastern District of Michigan). Adult-1 is Jolyan Raeed Zahrah’s father.

15. A subpoena return from Google revealed rdaXXXXspeedy@gmail.com had a display name of “dDARS,” accessed the IP

address numerous times between July 2024 and January 2025, and had a recovery email of jolyanzahrahXXXX@gmail.com.

16. According to records received from the State of Michigan, 18-year-old Jolyan Raeed Zahrah, date of birth XX/XX/2006, resides at XXXXX Ring Neck Drive.

Reports of CSAM Sharing on DISCORD to NCMEC

17. NCMEC is a private, non-profit corporation whose mission is to help find missing children, reduce child exploitation, and prevent child victimization. The NCMEC CyberTipline is a reporting mechanism for the public and electronic service providers to report instances of suspected child sexual exploitation. Per the NCMEC website, “a critical function of the CyberTipline is to refer reports to the law enforcement agency that is best able to respond and address the issue being reported... the CyberTipline serves as a global clearinghouse and reports are referred to law enforcement through the U.S. and around the world.” NCMEC makes CyberTipline reports available to local, state and federal law enforcement agencies, as well as foreign law enforcement partners.

18. NCMEC reported to the FBI that, Discord user “Wakakapidoras” uploaded one file categorized as Apparent Child Pornography to Discord on January 3, 2025, at 08:28:41 UTC. On January 3, 2025, the user of the account logged in to

the IP address associated with XXXXX Ring Neck Drive, where Jolyan Raed Zahrah and his family resides.

19. NCMEC also reported that Discord user “Samanthapidoras” uploaded one file categorized as Apparent Child Pornography to Discord on January 4, 2025, at 22:04:49 UTC. The user of that account logged in to Discord using the same IP address on January 4, 2025.

20. I have reviewed the two files associated with the NCMEC tips. The review showed two files that meet the federal definition of child pornography. Below is a description of those files:

- a. A photo of a nude prepubescent female displaying her vagina in a sexual manner.
- b. A video of a pubescent male anally penetrating himself with a toilet bowl cleaning brush and a cucumber.

Execution of Residential Search Warrant at XXXXX Ring Neck Drive

21. On April 11, 2025, a search warrant was executed at XXXXX Ring Neck Drive. During the search, an iPhone 14 Plus was seized from Jolyan Raed Zahrah.

22. While at the house, Zahrah provided the passcode to his iPhone 14 Plus. While reviewing the phone, I observed that Zahrah’s phone was logged in to 13 total Gmail accounts.

23. In a post-*Miranda* interview on April 11, 2025, Zahrah made the following admissions:

- a. Zahrah admitted to using many different Discord usernames.
- b. He admitted he was currently an administrator of a specific Discord server (hereinafter “the Identified Discord Server,” the name of which was specifically identified), which is a role he obtained in 2023 and maintained until present.
- c. He demonstrated intimate knowledge of 764-related activity and indicated that 764 was related to the Identified Discord Server “in some vague way.” For example, Zahrah described 764 being shut down on Discord and many users migrating to the Identified Discord Server.
- d. Zahrah also described 764-related activities as getting young girls to cut themselves and described seeing an image of “764” cut onto someone’s arm. He also acknowledged that he knew there were “things with children,” blood, and satanism. He later added that he knows 764 tells people to kill their pets and do sexually explicit things in order to control a person.
- e. Zahrah acknowledged seeing “child porn” on the Identified Discord Server around 2024. He defined child porn as children under 18 being

nude. He also acknowledged viewing images of children between the ages of 5 and 10 years old.

- f. Throughout the interview, Zahrah attempted to minimize his involvement in child porn on the Identified Discord Server by claiming that he never shared CSAM, that he never asked anyone to do anything sexually explicit, and he claimed his role on the Identified Discord Server was to ban images of CSAM.
- g. Zahrah claimed child porn would be on the Identified Discord Server once every week to every two weeks, but there were periods where the frequency was higher.
- h. Zahrah had knowledge of another user on the Identified Discord Server, and claimed that user asked an underage girl for nude videos.
- i. Zahrah also had knowledge of an incident where a user self-harmed and sent “nudes” to another person in the Identified Discord Server. The person who received the “nudes” sent them to the entire Identified Discord Server.
- j. Near the end of the interview, questioners confronted Zahrah with some of the chats and images that his accounts had sent on the Identified Discord Server. Zahrah admitted he has said “terrible things,” and

things he was “not proud of.” The interview was terminated shortly thereafter.

Review of Zahrah’s Phone Contents

24. During a subsequent review of Zahrah’s phone contents, which included photos and videos, I observed one stored file that met the federal definition of child pornography. Below is a description of the file:

- a. A photo of a prepubescent female performing oral sex on an adult male penis.

25. I also observed numerous media files that met the federal definition of animal crushing as set forth in 18 U.S.C. § 48(f) (defined as “actual conduct in which one or more living non-human mammals, birds, reptiles, or amphibians is purposely crushed, burned, drowned, suffocated, impaled or otherwise subjected to serious bodily injury (as defined in section 1365 and including conduct that, if committed against a person and in the special maritime and territorial jurisdiction of the United States, would violate section 2241 or 2242”)). Below are example descriptions of the files:

- a. A photo of an adult male penis penetrating a puppy anally.
- b. A photo of an adult male penis penetrating a turtle.
- c. A photo of an adult male engaging in intercourse with a deer carcass.

Search Warrant for Discord Accounts

26. On April 29, 2025, the FBI served a federal search warrant to Discord for the contents of all retained records, communications, messages, attachments, etc. associated with two of Zahrah's Discord accounts. The accounts were identified as belonging to Zahrah, in part, through his IP address and through the Gmail accounts that his phone was logged into at the time the residential search warrant was executed. On April 30, 2025, Discord provided all requested content for those accounts.

27. I and other agents have conducted a preliminary review of the media files and associated chats from Zahrah's Discord accounts. The preliminary review showed that one account shared four files that contained videos of animals being purposely crushed, impaled, or otherwise subjected to serious bodily injury and met the federal definition of animal crushing. Another account shared 27 files that contained videos of animals being purposely crushed, burned, impaled, or otherwise subjected to serious bodily injury and met the federal definition of animal crushing. Below are example descriptions of files shared by Zahrah's Discord accounts:

- a. A video of a live adult dog being held by the scruff of the neck to a blowtorch.
- b. A video of a live adult dog being repeatedly hit in the head with a shovel.

- c. An anime-style comic with an embedded video of a male penis penetrating a puppy.
- d. A video of a live kitten tied down on its back being sliced open from tail to throat.
- e. A video of a kitten's face being pulled apart with pliers and sliced open with other tools.
- f. A video of a live kitten being repeatedly stomped on.
- g. A video of a live kitten with its paws nailed down being tortured with a hot metal rod.
- h. A video of a live skinned cat.
- i. A video of a python attached to a cannister being filled with air.
- j. A video of an adult male penis repeatedly penetrating a deceased rat.
- k. A video of an adult male penis repeatedly penetrating a frog's anus.

28. Zahrah's Discord account shared the videos to a variety of Discord group chats and direct messages. In direct messages with one Discord user, Zahrah and the other user discuss joining different Discord servers to "spam gore" and engage in "gorebombing." In my training and experience, "gorebombing" refers to

sending gore videos repeatedly in rapid succession to expose as many users in the group as possible to the gore content.

29. In a chat that occurred when Zarah was 18 years old, Zahrah stated, “I watched child porn and didn’t get hard to it so I’m not a paedophile [sic]... It’s legal for me to do that test since I’m also a minor... I got more pleasure kicking dogs”

30. On December 25, 2024, Zahrah had an extended conversation with a Discord user who identified him/herself as being 15 years old. In the conversation, Zahrah says “I wanna self harm again... I enjoy it because it’s the only cure for my loneliness.” Later, apparently referring to an animal crush video, the user says “it’s not a fucking joke... they killed the dog... thats a joke?” Zahrah responds, “would not sending the video revive the dog?” The user eventually says “leave mi [sic] alone,” and Zahrah responds “its my job to reinvite members who leave...”

31. Zahrah’s Discord accounts show behavior and distribution of content that is consistent with 764-related activity. This includes as noted above the distribution of animal crushing videos, CSAM, and other disturbing content.

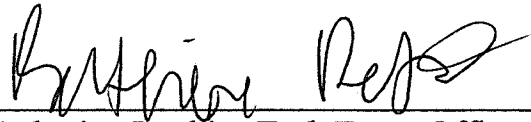
32. In my training and experience, the dissemination of animal crush videos, gore content, and CSAM is a tactic employed by NVEs, both individually and as a network. The purpose of distributing such content is to systematically and methodically target vulnerable populations and desensitize them to violence by, among other things, breaking down societal norms regarding engaging in violence,

normalizing the possession, production, and sharing of CSAM and gore material, and otherwise corrupting and grooming those individuals towards committing future acts of violence.

CONCLUSION

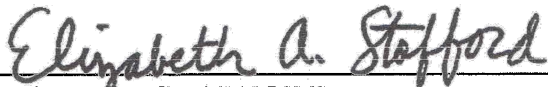
33. Based on the foregoing, there is probable cause to believe that Jolyan Raed Zahrah violated 18 U.S.C. §48(a)(3) (distribution of animal crush videos), 18 U.S.C. §§ 2252A(a)(2) (distribution of child pornography), and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,



Katherine Roshirt, Task Force Officer
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



ELIZABETH STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: June 13, 2025